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P: 920.469.1313 * F: 888.570.6460 (Enzymatic)
P: 920.469.9099 * F: 920.469.4418 (Phyto)

0729 6 JAN 23 P2:06

January 11, 2006

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

JAN 17 2006

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cell Forte® Purple Mushroom Defense™*	Purple Mushroom Defense™, Cell Forte's first line of defense, helps you take control naturally with 4 organic powerhouse mushrooms.*	Organic Purple Kculli Corn Agaricus (Agaricus blazei), Organic Purple Kculli Corn Matiake (Grifola frondosus), Organic Purple Kculli Corn Coryolis (Tremetes versicolor), Organic Purple Kculli Corn Reishi (Ganoderma lucidum), Organic Purple Kculli Corn Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster
Robert C. Doster
Title: Senior Vice President of Scientific Affairs
Date: 1/11/06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,
Michael P. Devereux
Michael P. Devereux
Chief Operations Officer

975 0162 LET 17185



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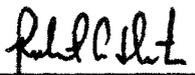
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cell Forte® Purple Mushroom Defense™*	Purple Mushroom Defense contains antioxidant-rich, organic purple kculli corn, for serious deep immune support.*	Organic Purple Kculli Corn Agaricus (Agaricus blazei), Organic Purple Kculli Corn Maitake (Grifola frondosus), Organic Purple Kculli Corn Coryolis (Tremetes versicolor), Organic Purple Kculli Corn Reishi (Ganoderma lucidum), Organic Purple Kculli Corn Extract

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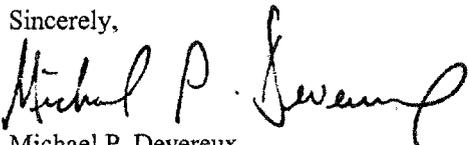
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Cell Forte® Purple Mushroom Defense™*	Providing the perfect mushroom growth medium, the purple kculli corn serves as the mushroom blend's power source for ultimate antioxidant protection.*	Organic Purple Kculli Corn Agaricus (Agaricus blazei), Organic Purple Kculli Corn Matiake (Grifola frondosus), Organic Purple Kculli Corn Coryolis (Tremetes versicolor), Organic Purple Kculli Corn Reishi (Ganoderma lucidum), Organic Purple Kculli Corn Extract

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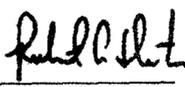
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cell Forte® Purple Mushroom Defense™*	Boosting the body's natural defenses against harmful free-radicals.*	Organic Purple Kculli Corn Agaricus (Agaricus blazei), Organic Purple Kculli Corn Maitake (Grifola frondosus), Organic Purple Kculli Corn Coryolis (Tremetes versicolor), Organic Purple Kculli Corn Reishi (Ganoderma lucidum), Organic Purple Kculli Corn Extract

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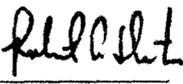
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Cell Forte® Purple Mushroom Defense™*	Unlike other "kitchen sink" formulas, Purple Mushroom Defense is empowered with the 4 most clinically studied species of mushroom-all grown on antioxidant-rich Peruvian purple kculli corn in a Certified Organic facility for targeted deep immune support.*	Organic Purple Kculli Corn Agaricus (Agaricus blazei), Organic Purple Kculli Corn Maitake (Grifola frondosus), Organic Purple Kculli Corn Coryolis (Tremetes versicolor), Organic Purple Kculli Corn Reishi (Ganoderma lucidum), Organic Purple Kculli Corn Extract

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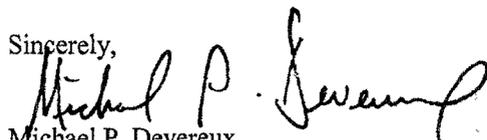
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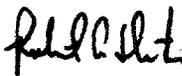
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Cell Forte® Purple Mushroom Defense™*	The special blend features high levels of naturally occurring beta-glucans, arabinoxylans, and arabinogalactans-types of polysaccharides that not only store energy, but also help strengthen the immune system and balance your body's natural defenses.*	Organic Purple Kculli Corn Agaricus (Agaricus blazei), Organic Purple Kculli Corn Maitake (Grifola frondosus), Organic Purple Kculli Corn Coryolis (Tremetes versicolor), Organic Purple Kculli Corn Reishi (Ganoderma lucidum), Organic Purple Kculli Corn Extract

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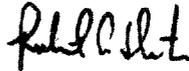
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Cell Forte® Purple Mushroom Defense™™	Synergistically, all components activate antioxidant power to amplify your immune functions and mobilize the natural killer cell "minutemen" into action.* As the troops scavenges free-radicals, it profoundly enhances your body's natural defenses.*	Organic Purple Kculli Corn Agaricus (Agaricus blazei), Organic Purple Kculli Corn Maitake (Grifola frondosus), Organic Purple Kculli Corn Coryolis (Tremetes versicolor), Organic Purple Kculli Corn Reishi (Ganoderma lucidum), Organic Purple Kculli Corn Extract

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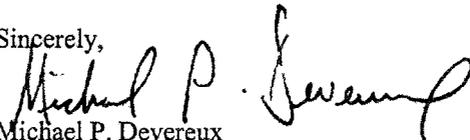
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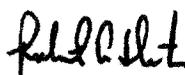
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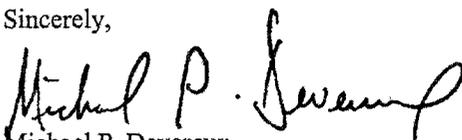
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Cell Forte® Purple Mushroom Defense™*	Protects against free radicals*	Organic Purple Kculli Corn Agaricus (Agaricus blazei)

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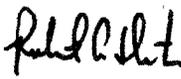
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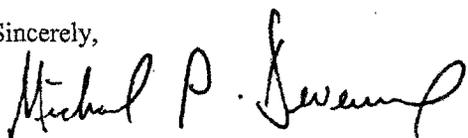
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cell Forte® Purple Mushroom Defense™*	Increases natural killer cell activity.*	Organic Purple Kculli Corn Coryolis (Tremetes versicolor)

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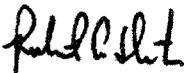
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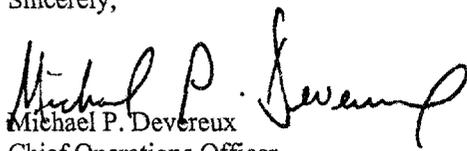
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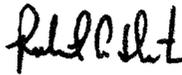
RE: Label Claims/Disclaimers

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This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

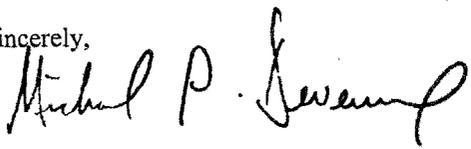
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cell Forte® Purple Mushroom Defense™*	Promotes longevity*	Organic Purple Kculli Corn Reishi (Ganoderma lucidum)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 1/12/06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux
Chief Operations Officer

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas
9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467

ENZYMATIC THERAPY®
&
PHYTOPHARMICA®
825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 • F: 888.570.6460 (Enzymatic)
P: 920.469.9099 • F: 920.469.4418 (Phyto)

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January 12, 2006

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

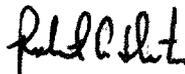
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cell Forte® Purple Mushroom Defense™*	Features ultimate antioxidant strength.*	Organic Purple Kculli Corn Extract

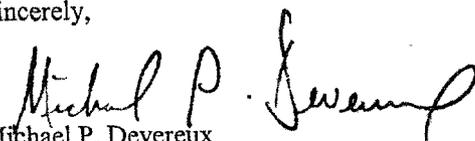
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